

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

In re: CARL E INGO,

Case No.: 24-70662-PBA

Debtor

Chapter 13

FREEDOMROAD FINANCIAL

Movant(s)

V.

CARL E INGO, and
CHRISTOPHER MICALE, TRUSTEE

Respondents.

RESPONSE

NOW COMES THE TRUSTEE, in response to a motion for relief from the automatic stay filed in the above-referenced case (the “Motion”) [Docket No. 21], and says as follows:

1. At the time of confirmation of the most recent chapter 13 plan, the Debtor(s) was/were required to make the ongoing payments to the creditor that filed the Motion.

2. As set forth in the Motion, a default in said payments is alleged at this time.

3. Accordingly, based on the Debtor(s)’ default, and if in fact proven to be true, the Trustee submits that any resolution should call for an amended plan to be filed in which both any arrears and future ongoing payments be made through the Trustee acting as the conduit so that such payments may be monitored.

4. However, to the extent the Debtor(s) fails to respond to the allegations set forth in the Motion within the time prescribed in the Court’s Pre-Hearing Order, the Trustee does not oppose the granting of relief and will endorse an order to such legal effect.

WHEREFORE, the Chapter 13 Trustee respectfully prays this Court that:

- A. An order be entered consistent with the relief requested in this Response; and
- B. That the Trustee have such other relief the Court deems necessary and proper.

**OFFICE OF THE CHAPTER 13 TRUSTEE
CHRISTOPHER T. MICALE, TRUSTEE**

By: /s/Rachel Jones
Rachel Jones, Esq.
*Staff Attorney for the Office
of the Chapter 13 Trustee*
PO Box 20608
Roanoke, VA 24018
chapter13_trustee@ch13wdva.com

CERTIFICATE OF SERVICE

The Undersigned hereby certifies that on March 03, 2025 a true and exact copy of the foregoing Response was uploaded to the Court's Electronic Case Filing System, notice of which shall be sent by operation of the Court's Electronic filing receipt to all parties entitled to receive notice electronically, including, Counsel for the Movant and Counsel for the Debtor(s).

/s/Rachel Jones